

## Vaughn, Lorena

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**From:** Quinones, Edwin  
**Sent:** Thursday, August 02, 2018 11:28 AM  
**To:** Vaughn, Lorena  
**Subject:** FW: Incident on Sunday, October 15, 2017  
**Attachments:** Clovelly Oil Questions 2.docx

**From:** Clay, Jeffrey  
**Sent:** Wednesday, October 18, 2017 1:43 PM  
**To:** Quinones, Edwin <quinones.edwin@epa.gov>  
**Subject:** FW: Incident on Sunday, October 15, 2017

The questions were sent.

Jeffrey M. Clay  
Assistant Regional Counsel  
Office of Regional Counsel  
Region 6  
U.S. Environmental Protection Agency  
1445 Ross Avenue (Mail Code 6RC-ER)  
Dallas, Texas 75202

(214) 665-7297 (phone)  
(214) 665-3177 (fax)  
[clay.jeffrey@epa.gov](mailto:clay.jeffrey@epa.gov)

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**From:** Smith, Donald-M  
**Sent:** Wednesday, October 18, 2017 1:41 PM  
**To:** [bmatherne@clovellyoil.com](mailto:bmatherne@clovellyoil.com)  
**Subject:** Incident on Sunday, October 15, 2017

Mr. Matherne,

Please review the attached questions and answer to your best knowledge. We request that you return the answers by the close of business on Friday, November 3, 2017. If you have questions for me or need extra time, please contact me by email or phone.

If you have information that you consider to be confidential business information please do not include as an email, but contact me and we can determine if the information is needed.

Donald M. Smith  
6EN-AS  
U.S. Environmental Protection Agency Region 6  
214-665-7270

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1. Provide the name, title, email, phone number and mailing address for the person to whom correspondence should be sent regarding the incident.
2. Who owns and/or operates the location where the incident occurred?
3. Briefly describe the facility, e.g. discuss what activities take place on-site and what substances are produced, processed, handled or stored on-site. If the facility is an oil and gas production or storage site then answer the following questions:
  - Is there an API number or numbers associated with the facility? Please provide.
  - Does the facility have a Facility Response Plan?
  - List all storage tanks, production or otherwise, identify the capacities, contents and volumes of materials on the date of the incident.
4. What process units or equipment were involved in the event? Provide a brief description and process flow diagram for the processes involved.
5. At the time of the incident, was the facility operating under a Title V Air Permit?
6. What is the SIC and NAICS code for the facility where the event occurred?
7. Did the event take place at a Risk Management Program covered process? Are there any Risk Management Program covered processes at the facility?
8. Provide a detailed description and timeline of the event. Include the best known start time and duration of the incident and the timeline for any emergency response.
9. What specific substances were released to any media during the event? Please include the estimated or known amounts of each substance? Include all air contaminants that were released during the event, even those materials with release amounts below the reportable quantity.
10. Have there been any investigations or audits of the event? Are investigations or audits pending? Who performed the investigations or audits? Provide a copy of any reports, audits, or any other analysis, including any drafts, describing the causes or consequences of the event, including all preliminary draft reports or analysis and/or draft audit results.
11. What is the initial best known cause or root cause of the event? Were there any additional contributing factors that you are aware of?
12. What measures have been taken to address the findings, conclusions or recommendations of the investigations or audits?
13. Are there any findings, conclusions, or recommendations that have not been addressed fully, and if so, what measures remain to be taken, and what is the expected timeline for implementing those measures?

14. Were there any fatalities or injuries attributed to the event? If yes, explain.
15. Did you, or anyone else, issue any evacuation, road closure, or shelter-in-place orders as a result of the event for your facility or surrounding community? If yes, explain.
16. Was there any property or equipment damage, either on-site or off-site, that resulted from the event? If yes, explain what was damaged and the extent of damages.
17. What emergency response measures were taken, by you or anyone else, to stop and/or to minimize hazards from the event?
18. Did you or anyone else the facility perform any air monitoring during or after the event, including any routine monitoring? If so, then please provide a summary of the results.
19. Identify and provide copies of any industry standards, internal standards, SOPs, or manufacturer's recommendations related to the incident including equipment, process units, and personnel activities involved in the incident, including line cleaning.
20. Please provide any documents associated with the identification of hazards at your facility related to the incident. Provide a copy of any Standard Operating Procedure for Hot Work including any procedures for monitoring for explosive atmosphere.
21. Has any local, state, or federal agency conducted an investigation or requested information regarding the event? If so, please provide the name and contact information for each agency person who conducted an inspection or requested information.
22. Was any work or maintenance occurring at the facility at the time of the incident? If so, then please describe the nature of the work and who was conducting it? Were there contractors at the facility at the time of the incident? If so then please identify them and provide a summary of why they were at the facility at the time of the incident.
23. Please identify by name, title, and employer every person at the facility at the time of the incident.

If you plan to claim any information as confidential business information, please call me so that we can discuss options prior to your sending - DO NOT EMAIL.

If you have any questions, please feel free to contact me at the email/phone listed below. Please provide the above requested information by COB Friday, November 3, 2017.